

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

VEENOD PATEL, et al.)	
)	
)	
Plaintiffs,)	
)	
v.)	No. 08 C 386
)	
DILIPKUMAR PATEL, et al.,)	
)	Judge Blanche M. Manning
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT INSTANTER**

NOW COME the plaintiffs and for their Motion for Leave to File Second Amended Complaint Instanter state as follows:

1. After much consideration, the plaintiffs have elected to withdraw their motion to remand to state court.
2. In keeping with the federal pleading requirements, plaintiffs submit their proposed Second Amended Complaint, attached hereto as Exhibit A.
3. Plaintiffs oppose the entry of sanctions and attorneys' fees concerning the motion for remand as the plaintiffs believe the position of defendants as shown in their response has merit, and plaintiffs voluntarily withdraw their opposition to federal jurisdiction. This is an early stage of the litigation and plaintiffs did not intend to inconvenience or harass the defendants.

WHEREFORE, the plaintiffs pray that this Honorable Court grant leave to plaintiffs to file instanter their Second Amended Complaint, and for such further relief as the court deems just.

Dated: March 31, 2008

Respectfully submitted,

PLAINTIFFS

s/ Paul Caghan
Paul Caghan, P.C.
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Chicago, IL 60614
(312) 251-1101
(A.R.D.C. #3123213)

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that service was accomplished on March 31, 2008 pursuant to ECF as to Filing Users and service complies with LR 5.5 as to any party who is not a Filing User or represented by a Filing User.

s/ Paul Caghan
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